

BROWN AND SEELYE PLLC
Ellen Ann Brown Esq.
Susan H. Seelye Esq.
744 South Fawcett Ave
Tacoma, WA 98402
Telephone 253-573-1958
Facsimile 253-274-1200

HONORABLE TIMOTHY W. DORE
HEARING DATE: September 19, 2018
TIME: 9:30 am

Chapter 13

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT COURT OF WASHINGTON**

Re

SINPRASEUT PHOMMA

Debtor(s)

In Chapter 13 Proceeding
No. 18-12071-TWD

**RESPONSE TO OBJECTION TO
CONFIRMATION**

COMES NOW the above-referenced debtor(s) through their attorneys of record and states:

The Debtor has requested but not yet received a copy of the second mortgage which is not due until sale of the property. The documents are expected to be received within the next few days and, if necessary, an amended Plan will be filed if necessary.

Debtor's counsel requested several weeks ago any other changes requested to this case from the Trustee and stated that the amended Plan would be set for hearing as soon as the documents were received so that a correct plan could be confirmed.

Debtor's counsel also called to inform the Trustee's office that she would be going to the hospital this week and requested to know if there were any other issues and did not hear back from them.

On Monday the Chapter 13 office filed a new Objection to Confirmation and today entered a Declaration of no Objection and Received Unsigned Order even though they are aware that Debtor's counsel is extremely ill and not at the office.

The Debtor requests that the Order not be entered and to allow her to file the notice to confirm Amended Plan and a proof of service tomorrow. It was previously indicated that it would be more beneficial to wait until the second mortgage information had been received but since it is imperative that this matter not be dismissed the Notice and Motion and Proof of Service on the current Plan will be filed tomorrow and the requested Trustee documents of the second mortgage will be forwarded immediately upon receipt as they have been requested and the request has been verified by phone but the documents have not yet arrived.

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2 Therefore it is requested that this matter not be dismissed, that the Notice to Confirm
3 and Proof of Service be allowed to be filed tomorrow in this matter and that the Trustee
4 be allowed to receive the requested second mortgage document as soon as available
5 and that the case not be dismissed due to the document's delay as the Debtor and her
6 attorney have requested the documentation after the meeting of creditors but it has not
7 yet been received.

8 Dated September 13, 2018

9 /s/ Ellen Ann Brown

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ELLEN ANN BROWN WSB#27992
Attorneys for Debtor(s)